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Mr. Chris Corbett
U.S. EPA, Region III
1650 Arch Street
Philadelphia, PA

ENVIRONMENTAL

Subject:
RE: Comments on Proposed Plan: Kane & Lombard Superfund Site Operable Unit No. 2

Date:
21 January 2003

Contact:
Jeffrey P. Sgambat

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410.987.0032

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JSgambat@arcadis-us.com

Dear Mr. Corbett:

ARCADIS G&M has prepared this letter on behalf of Lucent Technologies, Inc., formerly American Telephone and Telegraph; Browning Ferris, Inc.; General Motors Corporation; and the Baltimore Gas & Electric Company for Operable Unit 2 at the Kane & Lombard Superfund Site. We have reviewed the Proposed Plan (dated December 2002) and appreciate the opportunity to offer these comments. We support the Preferred Alternative as it is an effective way to protect human health and the environment. The Preferred Alternative can provide effective long-term remediation to meet the Remedial Action Objectives. Additionally, the Preferred Alternative provides a means to gather useful data to evaluate future natural attenuation options. The Preferred Alternative makes use of existing institutional controls, which effectively prevent groundwater use, provides an easily implementable Soil Management Plan to protect workers in the Study Area, and proposes an in-situ technology that enhances natural biodegradation processes and keeps treatment below ground.

Other alternatives, such as the pump and treat alternative, do not materially decrease the time of remediation, and have a number of serious potential drawbacks. As a result, we agree that EPA has properly rejected those alternatives. On the other hand, we believe that natural attenuation processes will ultimately stabilize and remediate the groundwater plume, but understand that more data are needed to support this opinion.

The following are specific comments on the Proposed Plan:

Page 7 (bottom of right column) - The Proposed Plan specifies monitoring approximately 15 wells to evaluate effectiveness of the cleanup, and that wells "would rotate" from event to event. We suggest that this be modified to say, "well locations could vary from event to event depending on results of previous samplings." This is important because there is significant value to establishing a continuous, long-term record from select wells in order to establish a solid

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time-series at key locations. The most likely scenario is that the majority of wells would be sampled consistently (each and every event), and that a few wells at different locations might be sampled periodically.

Page 7 (bottom of right column) – The Proposed Plan states that samples would be collected quarterly in the first three years, followed by semi-annual sampling in the fourth and fifth years, and annually thereafter. We suggest that the third year sampling also be semi-annual. Guidance protocol for establishing trends for a natural attenuation (NA) analysis is eight quarters of monitoring data, this will be achieved after two years of quarterly sampling. Semi-annual sampling in years three, four and five, followed by annual sampling thereafter will be more than adequate for establishing long-term COC concentration trends. Groundwater flow in the Upper Patuxent aquifer is relatively slow and significant changes in water quality will not occur rapidly (i.e. in three to six months). The O&M Plan can be written to require that sampling intervals for select wells be more frequent if the data suggest that changes are occurring more rapidly than anticipated.

Page 9 – (middle of left column) – The Proposed Plan states that the Soil Management Plan (SMP) would be compiled to define the extent of lead and antimony in subsurface soil. We believe that this exceeds the intent of the SMP. The purpose of the SMP is to identify soil management protocols for handling and disposal of specific soil removal actions that could be planned by site owners or by public agencies (for utilities, etc.). In these cases, delineation of metals and VOCs in the immediate area of the proposed work prior to excavation might be warranted if existing information is not sufficient to plan for health and safety procedures, and soil handling and disposal options. Given the planned institutional controls, there is no reason for further general delineation of COCs in the Study Area.

Page 10 – (middle of left column) - The Proposed Plan provides cost estimates for the Preferred Alternative. These costs were originally presented in the Feasibility Study (FS) report. However, since the Preferred Alternative differs slightly from the alternative described in the FS (because of certain scope changes made by U.S. EPA), the cost of the Preferred Alternative is actually somewhat higher. Present value costs for the work described in the Proposed Plan based on a 30-year duration for the project are as follows:

Total Capital Cost: $3,454,700
Annual Cost: $480,000
Total Present Worth Annual Cost: $3,890,300
Total Present Worth Capital and Annual Cost: $7,345,000

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Thank you for the opportunity to provide comments on the Proposed Plan. Please do not hesitate to request clarification of any comment that is unclear.

Sincerely,

ARCADIS G&M, Inc.

Jeffrey P. Sgambat, C.P.G.
Vice President/Project Director

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